



THOMAS AMBROSIO
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Member of NJ & NY Bars

August 21, 2020

VIA ECF

Hon. Ronnie Abrams, U.S.D.J.
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

RE: USA vs Fernando Keyes
Indictment 20-cr-95

Application granted. The
conference is adjourned to
September 2, 2020 at 9:00 a.m.

SO ORDERED.

Ronnie Abrams, U.S.D.J.
August 21, 2020

Dear Judge Abrams:

The above referenced matter is scheduled for a status conference before Your Honor on August 24, 2020. I advised Your Honor at the last hearing date that I would advise the Court if Mr. Keyes was going to enter a guilty plea on August 24, 2020.

Since the last hearing I received an alternative plea offer for Mr. Keyes to consider. I mailed him the plea the day I received it last week and have requested a legal call with him at MCC.

Unfortunately, despite my request, I have not received a call from Mr. Keyes in order to consult with him. I made another request for a legal call this morning.

With the consent of Alexandra Rothman, AUSA I am respectfully requesting that the August 24th status date be adjourned at least one week to afford me adequate time to confer with Mr. Keyes.

My ability to adequately consult with Mr. Keyes has been severely hampered by the COVID-19 pandemic.

In closing, I hope this letter finds Your Honor and your staff well.

Respectfully yours,

/s/Thomas Ambrosio
Thomas Ambrosio

cc: Alexandra Rothman (via ECF)
Fernando Keyes (via regular mail)